

James E. Torgerson (Bar No. 8509120)
Connor R. Smith (Bar No. 1905046)
STOEL RIVES LLP
510 L Street, Suite 500
Anchorage, AK 99501
Telephone: 907.277.1900
Facsimile: 907.277.1920
jim.torgerson@stoel.com
connor.smith@stoel.com

Beth S. Ginsberg (Pro Hac Vice Pending)
James C. Feldman (Bar No. 1702003)
STOEL RIVES LLP
600 University Street, Suite 3600
Seattle, WA 98101
Telephone: 206.624.0900
Facsimile: 206.386.7500
beth.ginsberg@stoel.com
james.feldman@stoel.com

Attorneys for Proposed Intervenor-Defendant
NANA Regional Corporation, Inc.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

NORTHERN ALASKA
ENVIRONMENTAL CENTER, *et al.*,

Plaintiffs,

v.

DEBRA HAALAND, in her official
capacity as Secretary of the U.S.
Department of the Interior, *et al.*,

Defendants,

and

AMBLER METALS LLC, *et al.*,

Intervenor-Defendants.

Case No.: 3:20-cv-00187-SLG

**JOINT STIPULATION AS TO MOTION TO INTERVENE BY NANA
REGIONAL CORPORATION, INC.**

Northern Alaska Environmental Center, et al. v. Haaland, et al.
Case No. 3:20-cv-00187-SLG

On May 18, 2021, NANA Regional Corporation, Inc. (Movant) filed a motion to intervene in the above-captioned litigation. Plaintiffs and Movant submit this Joint Stipulation to further judicial economy and avoid unnecessary filings relating to the intervention motion. After conferring, Plaintiffs and Movant agree to the following:

1. Plaintiffs will not oppose Movant's intervention.
2. Movant will use its best efforts to coordinate with counsel for the federal Defendants and any other Intervenor-Defendants as effectively as possible to avoid unnecessary duplicative briefing of matters covered in their merits briefs.
3. Plaintiffs and Movant anticipate discussions with counsel for the other parties regarding the merits briefing schedule. Movant is amenable to changes in the briefing schedule that will allow Plaintiffs sufficient time to reply to briefs by both Federal Defendants and Movant (as well as any additional intervenors) and appropriate adjustments to Plaintiffs' page limits on reply, subject to the discussions with the other parties.
4. Plaintiffs and Movant do not anticipate discovery in this action involving judicial review of agency decision-making, and they acknowledge that the initiation of any discovery would require leave from the Court.
5. At this time, Movant does not anticipate filing a motion to dismiss in advance of merits briefing.

DATED: May 18, 2021

STOEL RIVES LLP

By: /s/ James E. Torgerson
James E. Torgerson (Bar No. 8509120)
Beth S. Ginsberg (Pro Hac Vice Pending)
James C. Feldman (Bar No. 1702003)
Connor R. Smith (Bar No. 1905046)

TRUSTEES FOR ALASKA

By: /s/ Bridget Psarianos (consent)
Bridget Psarianos (Bar No. 1705025)
Suzanne Bostrom (Bar No. 1011068)
Brian Litmans (Bar No. 0111068)

WESTERN MINING ACTION PROJECT

By: /s/ Roger Flynn (consent)
Roger Flynn (Pro Hac Vice)

CERTIFICATE OF SERVICE

I hereby certify that on May 18, 2021, I filed a true and correct copy of the foregoing document with the Clerk of the Court for the United States District Court, District of Alaska, by using the CM/ECF system. Participants in this Case No. 3:20-cv-00187-SLG, who are registered CM/ECF users, will be served by the CM/ECF system.

/s/ James E. Torgerson
James E. Torgerson

Northern Alaska Environmental Center, et al. v. Haaland, et al.
Case No. 3:20-cv-00187-SLG